

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA

v.

21-cr-10104 (PBS)

VLADISLAV KLYUSHIN,
a/k/a “Vladislav Kliushin”
IVAN ERMAKOV,
a/k/a “Ivan Yermakov,” and
NIKOLAI RUMIANTCEV,
a/k/a “Nikolay Rumyantsev,”

Defendants

JOINT MOTION TO CONTINUE SENTENCING

The United States of America and defendant Vladislav Klyushin, by their counsel, respectfully propose that the Court continue the defendant’s sentencing from May 4, 2023 to May 17, 2023, or a later date convenient to the Court, subject to the availability of a Russian-language interpreter. As grounds for the motion, the parties respectfully submit that the requested continuance will permit the Court to hear and decide the defendant’s motion to acquit, Docket No. 222, before it imposes sentence.

Respectfully submitted,

VLADISLAV KLYUSHIN
Defendant

RACHAEL S. ROLLINS
United States Attorney

By: /s/Maksim Nemtsev
MAKSIM NENTSEV
MARC FERNICH
Counsel to Defendant Klyushin

By: /s/Seth B. Kosto
SETH B. KOSTO
STEPHEN E. FRANK
Assistant U.S. Attorneys

Date: April 11, 2023

CERTIFICATE OF SERVICE

I hereby certify that a true copy of the parties' joint motion to continue the sentencing date will be served through Electronic Case Filing on counsel of records.

/s/Seth B. Kosto
SETH B. KOSTO
Assistant United States Attorney

April 11, 2023